

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

<b>ALEXANDER M. SHUKH,</b>  Plaintiff,  vs.  <b>SEAGATE TECHNOLOGY LLC, SEAGATE TECHNOLOGY, INC., SEAGATE TECHNOLOGY, SEAGATE TECHNOLOGY PLC, and UNKNOWN OWNERS AND ASSIGNEES,</b>  Defendants.	Civil No. 10-CV-404 (JRT/JJK)  <b>DECLARATION OF ELIZABETH COWAN WRIGHT IN SUPPORT OF SEAGATE'S MOTION FOR PROTECTIVE ORDER</b>
<b>SEAGATE TECHNOLOGY LLC and SEAGATE TECHNOLOGY,</b>  Counterclaimants,  vs.  <b>ALEXANDER M. SHUKH</b>  Counterclaim Defendant.	

I, Elizabeth Cowan Wright, declare as follows:

1. I am an attorney at Faegre Baker Daniels LLP in Minneapolis, Minnesota.

I am one of the lawyers representing Seagate in connection with the above-captioned action. This declaration is made on my personal knowledge and belief.

2. I have attached to this declaration a true and correct copy of the following documents:

**EXHIBIT A:** Excerpts from transcript of the pretrial conference held on June 27, 2011.

**EXHIBIT B:** Plaintiff/Counter-Defendant Alexander M. Shukh's Subpoena to IBM, dated December 17, 2012.

**EXHIBIT C:** Plaintiff/Counter-Defendant Alexander M. Shukh's Subpoena to Internatix Corporation, dated December 18, 2012.

**EXHIBIT D:** Plaintiff/Counter-Defendant Alexander M. Shukh's Amended Subpoena to IBM, dated December 19, 2012.

**EXHIBIT E:** Plaintiff/Counter-Defendant Alexander M. Shukh's Request for Production to Seagate, dated January 4, 2013.

**EXHIBIT F:** Plaintiff/Counter-Defendant Alexander M. Shukh's Subpoena to the American Arbitration Association, dated January 7, 2013.

**EXHIBIT G:** Plaintiff/Counter-Defendant Alexander Shukh's Subpoena to International Association of Rehabilitation Professionals, dated December 21, 2012.

**EXHIBIT H:** Plaintiff/Counter-Defendant Alexander M. Shukh's Subpoena to Sedey Harper, P.C., dated December 28, 2012.

**EXHIBIT I:** Plaintiff/Counter-Defendant Alexander M. Shukh's Subpoena to the College of St. Benedict, dated January 2, 2013.

**EXHIBIT J:** Plaintiff/Counter-Defendant Alexander M. Shukh's Subpoena to Southern Illinois University, dated January 2, 2013.

**EXHIBIT K:** Plaintiff/Counter-Defendant Alexander M. Shukh's Subpoena to the University of St. Thomas, dated January 2, 2013.

**EXHIBIT L:** Plaintiff/Counter-Defendant Alexander M. Shukh's Subpoena to the College of St. Benedict, dated January 3, 2013.

**EXHIBIT M:** Plaintiff/Counter-Defendant Alexander M. Shukh's Subpoena to the University of St. Thomas, dated January 3, 2013.

**EXHIBIT N:** Seagate's Objections to Plaintiff/Counter-Defendant Alexander M. Shukh's January 4, 2013 Request for Production to Seagate, dated January 7, 2013.

**EXHIBIT O:** January 10, 2013 email from counsel for Plaintiff/Counter-Defendant Alexander M. Shukh to counsel for Seagate.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: January 10, 2013

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*s/ Elizabeth Cowan Wright*  
Elizabeth Cowan Wright